

Remarks/Arguments

The amendments set forth herein are provided solely to clarify the invention as filed and set forth in the pending claims in order to comply with applicable statutes and regulations. The amendments are not intended to limit the invention or preclude the application of equivalents which Applicant may be entitled to under law.

Status of the Application

Applicant respectfully requests reconsideration of the rejections and objections set forth in the Office Action mailed on 08/10/2006.

The Examiner has rejected claims 1-22 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 7,002,965 to *Cheriton* (*Cheriton*) in view of U.S. Patent No. 5,875,446 to *Brown et al.* (*Brown*).

The Examiner has further rejected claim 22 under 35 U.S.C. 112 as being indefinite.

As such, claims 1-22 are pending in this application.

The Claims

Cited Art

Brown

Brown discloses methods for identifying topically related objects in a database (see Abstract). A user searching a database, as disclosed by *Brown*, may receive a first set of ranked objects corresponding with a query (see col. 12, l. 53 – col. 13, l. 9). A user then iteratively selects a desired relationship whereupon the method sorts the results (see. Col. 13, ll. 19-58). In this manner, a user may dynamically select and sort any desired relationships.

Cheriton

Cheriton discloses methods for classifying packets utilizing TCAM and CAM stages in sequence (see Abstract). As disclosed by *Cheriton*, methods receive a packet or packet header 201 by a TCAM, which generates a result to address a memory address 203, which memory address in turn generates a classification 204 (see col. 6, ll. 8-44; FIGS. 2A-B; *emphasis added*). If multiple classifications are derived, selection logic 206 may then select from the various classifications whereupon a packet classification signal is generated (see *id.*).

Rejections Under 35 U.S.C. § 103 (a)

Claims 1-22

The Examiner has rejected claims 1-22 under 35 U.S.C. 103(a) as being unpatentable over *Cheriton* in view of *Brown*. Applicant respectfully traverses.

Claim I

As noted above, *Brown* discloses methods for identifying topically related objects in a database (*see Abstract*). A user searching a database, as disclosed by *Brown*, may receive a first set of ranked objects corresponding with a query (*see col. 12, l. 53 – col. 13, l. 9*). A user then iteratively selects a desired relationship whereupon the method sorts the results (*see. Col. 13, ll. 19-58*). In this manner, a user may dynamically select and sort any desired relationships.

In contrast, amended claim 1 requires, “*a searchable memory block having a first type memory portion and a second type memory portion, wherein the searchable memory block is configured with a plurality of entries, the plurality of entries configured to provide a search result in response to a search key...*” Applicant submits that a searching a database as disclosed by *Brown* does not reasonably anticipate searching a memory block. While databases must, of necessity occupy some memory storage, databases are search by query which is related in someway to the values stored by the database as opposed to a value representing a specified portion of a searchable memory block as required by the present claims.

Further, amended claim 1 requires, “*a first table having a plurality of stored values, wherein each of the plurality of stored values corresponds with one of the plurality of entries, the first table configured to receive the search result and to provide a selection signal in response to the search result, the selection signal corresponding with at least one of the plurality of entries...*” Thus, the result of a search of a searchable memory block returns a number of search results which correspond with values in a table, which values include grouping information (*see for example claim 6*). *Brown*, however, discloses methods by which a user iteratively selects a relationship from among a first selected group of objects whereupon methods search again based on that iterative selection. As such, Applicant submits that *Brown* does not reasonably anticipate limitations requiring tables having a plurality of stored values as required by the present claims.

As noted above, *Cheriton* discloses methods for classifying packets utilizing TCAM and CAM stages in sequence (*see Abstract*). As disclosed by *Cheriton*, methods receive a packet or packet header 201 by a TCAM, which *generates* a result to address a memory address 203, which memory address in turn *generates* a classification 204 (*see col. 6, ll. 8-44; FIGS. 2A-B*;

emphasis added). If multiple classifications are derived, selection logic 206 may then *select* from the various classifications whereupon a packet classification signal is generated (*see id.*).

Applicant submits that *Cheriton* does nothing to reasonably cure the deficiency in *Brown*. Furthermore, *Cheriton*, while disclosing usage of TCAM and CAM structures, does not do so in a manner that anticipates the present claims. For example, a result of the present claims does not generate a classification via use of a mask generator and hash function, rather, a table contains a plurality of stored values which correspond with entries in a searchable memory block, which blocks may include TCAM structures and SRAM structures (see for example, claims 2 and 3). Thus, application of *Cheriton* to the present claims is inapposite.

Therefore, for at least these reasons, Applicant respectfully submits that claim 1 is allowable over the cited art and requests that the above rejection be removed. Claims 2-13 depend either directly or indirectly from independent claim 1 and are therefore allowable over the cited art for at least the same reasons cited for claim 1.

Claim 14

Amended claim 14 requires, “performing a search operation on a searchable memory block,” which searchable memory block, as noted above for claim 1, is not anticipated by searching a database. In addition, claim 14 requires, “accessing a stored action group number in a first table, the stored action group number corresponding to each hit resulting from the search operation, the stored action group number including a group subfield and a *precedence number...*” As disclosed in *Brown*, search results may be ranked with respect to a query (see FIG. 10; step 615). That ranking is accomplished utilizing a computed value stored in an object hit list (*see col. 12, ll. 1-10*). A precedence number as indicated by the present claim is not calculated, but represents a portion of the stored value. Furthermore, precedence returns a search result for a group, but does not rank the results *per se*.

Applicant submits that *Cheriton* does nothing to reasonably cure the deficiency in *Brown*. Furthermore, *Cheriton*, while disclosing usage of TCAM and CAM structures, does not do so in a manner that anticipates the present claims. For example, a result of the present claims does not generate a classification via use of a mask generator and hash function, rather, a table contains a plurality of stored values which correspond with entries in a searchable memory block, which blocks may include TCAM structures and SRAM structures (see for example, claims 16 and 17). Thus, application of *Cheriton* to the present claims is inapposite.

Therefore, for at least these reasons, Applicant respectfully submits that claim 14 is allowable over the cited art and requests that the above rejection be removed. Claims 15-21 depend either directly or indirectly from independent claim 1 and are therefore allowable over the cited art for at least the same reasons cited for claim 14.

Claim 22

Amended claim 22 is a means/function claim having substantially similar limitations as claim 14 and is therefore allowable over the cited art for at least the same reasons cited for claim 14.

Rejections Under 35 U.S.C. § 112

Claim 22

The Examiner has rejected claim 12 under 35 U.S.C. 112 as being indefinite. Applicant respectfully traverses.

Applicant has amended claim 22 to a computer-readable medium having substantially the same limitations as claim 14. Therefore, for at least these reasons, Applicant respectfully submits that the present claims are allowable over the cited art and requests that the above rejection be removed.

Conclusion

Applicant believes that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application; the undersigned can be reached at the telephone number set out below.

The Commissioner is authorized to charge any additional fees to process this Amendment, or credit any over-payments that may apply, to our Deposit Account No. 50-2421.

Respectfully submitted,



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